Testimony
Elizabeth Gara
Connecticut Water Works Association
Before the
Public Health Committee
February 20, 2013

RE: Proposed HB- 5375 AN ACT REQUIRING BACKUP GENERATORS FOR PUBLIC WATER SUPPLY SYSTEMS.

Thank you for the opportunity to comment regarding HB-5375 which would require that public water supply systems, including wells maintained by homeowners associations, have backup generators for use when there is a power failure.

Recognizing the importance of providing residents and businesses with safe, reliable public water supplies, ***CWWA supports the intent of HB-5375*** – to ensure that all water systems have access to and the capacity to use appropriate back up power when there is a power failure.

Although recent storm events have posed many challenges for Connecticut, the vast majority of water companies were able to provide service to residents and businesses without interruption. There were, however, some smaller community systems that experienced service interruptions due to certain events such as sustained power outages. In general, these occurrences were limited to small water systems, such as homeowner associations and condominium complexes, who tend to have limited financial, technical and managerial resources with which to properly operate their systems. As a result, there have been efforts across the country to encourage consolidation of such systems to improve reliability and service for customers. Those same small systems, under the ownership of larger viable companies, are far better equipped to handle such emergencies. With access to the resources of a larger company, it may not be necessary to have generators at all locations, but the ability to get portable generators and supplies to facilities as needed.

As public water suppliers, CWWA members have an obligation to provide sufficient quantities of high quality water to meet the needs of consumers in the communities that we serve. We vigorously protect the quality, safety and reliability of our water supplies to meet this obligation. Recognizing how vital public water supplies are to public health and safety, water utilities have long been required under state and federal law to develop and implement emergency planning to respond quickly to contamination, damage or disruption to the water system. This includes making the necessary provisions for emergency power.

Many of Connecticut's water utilities have joined the Water/Wastewater Area Response Network (WARN) program whose mission is to support and promote statewide emergency preparedness, disaster response, and mutual assistance matters for public and private water and wastewater utilities. CtWARN is comprised of utilities providing assistance voluntarily to each

other in the form of personnel and resources during emergencies by means of a pre-arranged mutual aid agreement. To date, the participation and funding mechanism has been primarily the larger utilities, which are more likely to have staff and resources. Any measures by the legislature to encourage participation and to support the organization financially could be an important step to assist these smaller systems.

CWWA and our sister organization, the CT Section of the American Water Works Association, have been approached by the state Department of Public Health on possible regulations (Section 19-B102 (w)) regarding generators to ensure that water service is not compromised due to power outages.

While we find specific provisions of the proposed DPH regulations unnecessarily burdensome and difficult to implement, CWWA would be very interested in working with the Committee and the DPH on reasonable emergency generator legislation. The attached comments pertain to the draft DPH regulations and considerations that would be appropriate to provide for practical, workable requirements for emergency generators for water systems.

The Connecticut Water Works Association, Inc. (CWWA) is an association of private, municipal and regional public water supply utilities serving more than 500,000 customers, or population of about 2½ million people, located throughout Connecticut.

CWWA
1245 Farmington Ave., 103
West Hartford, CT 06107
Tel. 860-841-7350www.cwwa.org

CONSIDERATIONS FOR WATER SYSTEM GENERATOR REQUIREMENTS

Scope of the DRAFT DPH Regulations

The draft DPH regulations would require all facility locations to have a standby stationary onsite generator capable of supplying maximum starting and running power demands. The definition of facility location is anywhere that electric power is required to maintain a continuous supply of water at adequate volume and pressure.

- **Definition of Facility Location** included in the proposed regulations is overly broad and includes sources, pumping stations, treatment plants and storage tanks where electric power is required to maintain a supply of potable water.
- **Standby Power Requirements** - The draft DPH regulations would require all facilities to have standby power even in situations where multiple pump stations serve a single area or other redundancies exist. For example, a larger system may not need a generator on all supplies because certain wells may not be needed to supply the service area.

Generator Requirements

The draft DPH regulations would require all new generators, stationary or portable, to be fueled by propane or natural gas unless the fuel tank is above ground with a containment area capable of holding at least 110 percent of the full volume of the tank storing the liquid fuel and more than 200 feet from a source of supply. However, water companies have successfully used different types of generators to maintain system operations.

- **Battery-powered Generators** - Avon Water Company presently has generators for all of its production, booster and major facilities. There are 5 storage tanks and a major pressure reducing vault that have a battery backup system in the event of a power outage. These systems automatically draw power from deep cycle marine batteries during a power outage that are recharged every other day by 2 mobile generators that are brought to each facility as needed. This system works fine and is adequate as shown by successful operating during 3 major storm events.

Location of Generators

- **Remote Locations** - The draft DPH regulations would require generators, electrical switch gear and non-liquid fuel storage capabilities to be maintained in remote locations which could be subject to theft or vandalism, rendering them inoperable or unavailable when needed.
- **Containment Areas** – The draft DPH regulations would require a portable generator to have a containment area which could hold at least 110% of the full volume of the tank storing the fuel. This is unfeasible because storm related events generally include heavy

rains, winds and or snow. Placing a portable generator within a containment area runs the risk of the containment area flooding causing a greater hazard than the generator itself.

- **Setback Requirements** – The draft DPH regulations would require the generator to be placed more than 200 feet away from the source which could create hazardous situations for operators due to wiring hazards and flooding situations. Pump stations or other defined facilities may not have the foot print on site to allow the placement of a liquid fueled generator 200 feet away from the source.

Implementation Timeframe

The timeframes for compliance must take into consideration the funding, design, permitting, bidding and finally the construction of standby generation facilities or the switchgear associated with portable generator connections.

Testing Requirements

The draft DPH regulations would require the testing of all generator(s) including portables under full load capacity on a quarterly basis at each facility and to maintain a written record of such tests. Considering the number of "facilities" that a water system may have which would require standby generation in case of a catastrophic loss of power event, quarterly testing under full load would be burdensome and disruptive to the water system's normal operation. Generator load testing may create a disruption of the daily operation at a treatment plant or well which would adversely affect operational parameters, such as color, turbidity, chemical feed pumps, sample pumps, etc.

Notification Requirements

The draft DPH regulations would require water systems to notify DPH in writing of all of our existing stationary and portable generators, effectively registering or grandfathering them.